

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

VERISIGN, INC.,

Plaintiff,

v.

XYZ.COM, LLC

-and-

DANIEL NEGARI,

Defendants.

Case No. 1:14-cv-01749-CMH-MSN

PLAINTIFF'S OBJECTIONS TO DEFENDANTS' EXHIBIT LIST

Plaintiff VeriSign, Inc. ("Verisign"), through counsel, and pursuant to the Court's March 30, 2015 Scheduling Order, hereby files its objections to Defendants' list of exhibits. Verisign reserves the right to assert additional objections to any document, witness, or deposition testimony, or any other evidence that Defendant may seek to present at trial. Specifically, and without limitation, Verisign reserves its right to object to the relevancy or admissibility of any exhibit at trial should Defendants fail to establish a foundation. Verisign also reserves the right to object to any evidence it has designated as protected under the Protective Order (ECF 57) as necessary to preserve the document's confidentiality.

A. Exhibits expected to be used at trial

No.	Description	Date	Bates No.	Conf.	Objections
1	Email from Min Leone to Pat Kane, Scott Schnell, et al. attaching Verisign Questions for Naming Business, January	1/22/15	VRSN0000005619	Conf.	Relevance; Foundation; Hearsay

No.	Description	Date	Bates No.	Conf.	Objections
2	Verisign Questions for Naming Business, January 16, 2015	1/16/15	VRSN0000005621	AEO	Relevance; Foundation; Hearsay
3	Email from Patrick Brenner to Pat Kane, Scott Schnell, et al. attaching Verisign Inc.'s Questions for Naming Business, April 8, 2015	4/21/15	VRSN0000003616		Relevance; Foundation; Hearsay
4	Verisign, Inc. Questions for Naming Business, April 8, 2015		VRSN0000003617	AEO	Relevance; Foundation; Hearsay
5	Email from Luci Altman to Pat Kane, Scott Schnell, et al. attaching Verisign, Inc. Questions for Naming Business, July 10, 2014	7/15/14	VRSN0000049877	Conf.	Relevance; Foundation; Hearsay
6	Verisign, Inc. Questions for Naming Business, July 10, 2014	7/10/14	VRSN0000049879	AEO	Relevance; Foundation; Hearsay
7	.com Criticism & Positive Mentions Media Coverage Report March 31, 2014 – April 7, 2014	4/7/14	VRSN0000006352	AEO	Relevance; Foundation; Hearsay
8	Email from Kaitlin Holden to Scott Schnell et al. attaching .com Criticism & Positive Mentions Media Coverage Report April 21, 2014 – April 28, 2014	4/28/14	VRSN0000041269	Conf.	Relevance; Foundation; Hearsay
9	.com Criticism & Positive Mentions Media Coverage Report April 21, 2014 – April 28, 2014	4/28/14	VRSN0000041270	AEO	Relevance; Foundation; Hearsay
10	Email from Kaitlin Holden to Scott Schnell, Pat Kane, et al. attaching .com Criticism & Positive Mentions Media Coverage Report May 27 – June 2,	6/2/14	VRSN0000004034	AEO	Relevance; Foundation; Hearsay
11	.com Criticism & Positive Mentions Media Coverage Report May 27 – June 2, 2014	6/2/14	VRSN0000004035	AEO	Relevance; Foundation; Hearsay

No.	Description	Date	Bates No.	Conf.	Objections
12	Email from Kaitlin Holden to Scott Schnell, Pat Kane, et al. attaching .com Criticism & Positive Mentions Media Coverage Report June 2 - June	6/10/14	VRSN0000003826	AEO	Relevance; Foundation; Hearsay
13	.com Criticism & Positive Mentions Media Coverage Report June 2 - June 9, 2014	6/9/14	VRSN0000003827	AEO	Relevance; Foundation; Hearsay
14	Email from Kaitlin Holden to Scott Schnell, Pat Kane, et al. attaching .com Criticism & Positive Mentions Media Coverage Report June 9 – June 16,	6/16/14	VRSN0000004241	AEO	Relevance; Foundation; Hearsay
15	.com Criticism & Positive Mentions Media Coverage Report June 9 – June 16, 2014	6/16/14	VRSN0000004242	AEO	Relevance; Foundation; Hearsay
16	Email from Kaitlin Holden to Scott Schnell, Pat Kane, et al. attaching .com Criticism & Positive Mentions Media Coverage Report June 30 – July 7,	7/7/14	VRSN0000004340	Conf.	Relevance; Foundation; Hearsay
17	.com Criticism & Positive Mentions Media Coverage Report June 30 – July 7, 2014	7/7/14	VRSN0000004341	AEO	Relevance; Foundation; Hearsay
18	Email from Kaitlin Holden to Scott Schnell, Pate Kane, et al. attaching .com Criticism & Positive Mentions Media Coverage Report July 7 – 14,	7/15/14	VRSN0000004450	AEO	Relevance; Foundation; Hearsay
19	.com Criticism & Positive Mentions Media Coverage Report July 7 – 14, 2014	7/14/14	VRSN0000004451	AEO	Relevance; Foundation; Hearsay
20	Email from Kaitlin Holden to Scott Schnell, Pate Kane, et al. attaching .com Criticism & Positive Mentions Media Coverage Report August 12 –	8/21/14	VRSN0000050570	AEO	Relevance; Foundation; Hearsay
21	.com Criticism & Positive Mentions Media Coverage Report August 12 – 21, 2014	8/21/14	VRSN0000050571	AEO	Relevance; Foundation; Hearsay

No.	Description	Date	Bates No.	Conf.	Objections
22	Email from Kaitlin Holden to Scott Schnell, Pat Kane, et al. attaching .com Criticism & Positive Mentions Media Coverage Report August 21 –	8/26/14	VRSN0000006274	Conf.	Relevance; Foundation; Hearsay
23	.com Criticism & Positive Mentions Media Coverage Report August 21 – 26, 2014	8/26/14	VRSN0000006275	AEO	Relevance; Foundation; Hearsay
24	.com Criticism & Positive Mentions Media Coverage Report August 26 – September 2, 2014	9/2/14	VRSN0000006621	AEO	Relevance; Foundation; Hearsay
25	Email from Scott Schnell to Min Leone attaching 2015 Marketing Update PowerPoint Presentation by Scott	3/2/15	VRSN0000002000	AEO	Foundation; Hearsay
26	2015 Marketing Update PowerPoint Presentation by Scott Schnell	3/3/15	VRSN0000002001	AEO	Foundation; Hearsay
27	Email from Michael Chase to Scott Schnell regarding call with Andrew Gorrin discussing Network Solutions' promotion with XYZ	6/5/14	VRSN0000003009	AEO	Foundation; Hearsay
28	Letter from Thomas Indelicato to Matthew McClure (Web.com) regarding the registration of gtld-servers.xyz	8/7/14	VRSN0000003536	AEO	Foundation; Hearsay
29	Email from Min Leone to John Ho regarding Q3 2014 Diligence Questionnaire	12/22/14	VRSN0000003133	AEO	Relevance; Foundation; Hearsay
30	Verisign Questions for Naming Business October 7, 2014	10/7/14	VRSN0000003134	AEO	Relevance; Foundation; Hearsay
31	Email from Michelle Romano to Lori Shepherd attaching US Go to Market 2015 PowerPoint Presentation	12/30/14	VRSN0000004972	AEO	Foundation; Hearsay
32	US Go to Market 2015 PowerPoint Presentation		VRSN0000004974	AEO	Foundation; Hearsay

No.	Description	Date	Bates No.	Conf.	Objections
33	Email from Min Leone to Scott Schnell attaching Domain Business Update PowerPoint Presentation	2/2/15	VRSN0000005829	Conf.	Relevance; Foundation; Hearsay
34	Domain Business Update PowerPoint Presentation	February 2015	VRSN0000005830	AEO	Relevance; Foundation; Hearsay
35	Email from Jim Bidzos to Pat Kane and Scott Schnell regarding Web.com and Network Solutions	6/4/14	VRSN00000037095	Conf.	Foundation; Hearsay
36	Email from Scott Schnell to Jim Bidzos regarding Web.com and Network Solutions	6/4/14	VRSN00000037106	AEO	Foundation; Hearsay
37	Email from Scott Schnell to Jim Bidzos regarding Web.com and Network Solutions	6/4/14	VRSN00000037111	AEO	Foundation; Hearsay
38	Email from Scott Schnell to Jim Bidzos attaching Domain Name Marketing & Account Management Update PowerPoint Presentation by Scott Schnell	2/5/15	VRSN00000039889	AEO	Foundation; Hearsay
39	Domain Name Marketing & Account Management Update PowerPoint Presentation by Scott Schnell	2/10/15	VRSN00000039890	AEO	Foundation; Hearsay
40	Redline of #InternetOfficial Contest Post Mortem		VRSN00000060126	AEO	
41	Expert Report of Samuel Hewitt			AEO	Foundation; Undue prejudice; FRE 702 and 703
42	Expert Report of Hal Poret			AEO	Foundation; Undue prejudice; FRE 702 and 703

No.	Description	Date	Bates No.	Conf.	Objections
43	Expert Report of Thies Lindenthal			AEO	Foundation; Undue prejudice; FRE 702 and 703
44	Expert Report of Jothan Frakes			AEO	Foundation; Undue prejudice; FRE 702 and 703
45	Spreadsheet of Respondents' Responses to Michael Mazis's Survey Questions				Incomplete document
46	Google Analytics for webpage /believe/ Jan 1, 2013 – Dec 23, 2014		XYZ 00073571	AEO	Foundation; Hearsay; Authenticity
47	Google Analytics for webpage /believe/ Jan 1, 2013 – Jun 2, 2015		XYZ 00073572	AEO	Foundation; Hearsay; Authenticity
48	Google Analytics for webpage /boooooooooom/ Jan 1, 2013 – Dec 23, 2014		XYZ 00073573	AEO	Foundation; Hearsay; Authenticity
49	Google Analytics for webpage /boooooooooom/ Jan 1, 2013 – Jun 2, 2015		XYZ 00073574	AEO	Foundation; Hearsay; Authenticity
50	Google Analytics for webpage /com-net-xyz/ Jan 1, 2013 – Dec 23, 2014		XYZ 00073575	AEO	Foundation; Hearsay; Authenticity
51	Google Analytics for webpage /com-net-xyz/ Jan 1, 2013 – Jun 2, 2015		XYZ 00073576	AEO	Foundation; Hearsay; Authenticity

No.	Description	Date	Bates No.	Conf.	Objections
52	Google Analytics for webpage /teamwork/ Jan 1, 2013 – Dec 23, 2014		XYZ 00073577	AEO	Foundation; Hearsay; Authenticity
53	Google Analytics for webpage /teamwork/ Jan 1, 2013 – Jun 2, 2015		XYZ 00073578	AEO	Foundation; Hearsay; Authenticity
54	Google Analytics for webpage /blog/xyz- the-next-com Jan 1, 2013 – Dec 23, 2014		XYZ 00073579	AEO	Foundation; Hearsay; Authenticity
55	Google Analytics for webpage /blog/xyz- the-next-com Jan 1, 2013 – Jun 2, 2015		XYZ 00073580	AEO	Foundation; Hearsay; Authenticity
56	Google Analytics for webpage /registrars Jan 1, 2013 – Dec 23, 2014			AEO	Foundation; Hearsay; Authenticity
57	Google Analytics for webpage /registrars Jan 1, 2013 – Jun 2, 2015			AEO	Foundation; Hearsay; Authenticity
58	Email from David Kestenbaum to hello@xyz.com regarding National Public Radio request	3/27/14	XYZ 00073581	Conf.	Lack of Foundation; Hearsay; Authenticity
59	Email from David Kestenbaum to hello@xyz.com regarding National Public Radio Interview	3/27/14	XYZ 00073582	Conf.	Foundation; Hearsay; Authenticity
60	Email from Daniel Negari to David Kestenbaum regarding National Public Radio Interview	3/28/14	XYZ 00073583	Conf.	Foundation; Hearsay; Authenticity

No.	Description	Date	Bates No.	Conf.	Objections
61	CentralNic gTLD Services Agreement Amendment No. 4 Signed by Ben Crawford		XYZ 00221903	AEO	
62	CentralNic gTLD Services Agreement Amendment No. 4 Signed by Daniel Negari		XYZ 00221906	AEO	
63	CentralNic Invoice for August 2014	8/31/14	XYZ 00221857	AEO	
64	CentralNic Invoice for September 2014	9/30/14	XYZ 00221880	AEO	
65	CentralNic Invoice for October 2014	10/31/14	XYZ 00221879	AEO	
66	CentralNic Invoice for November 2014	11/30/14	XYZ 00221878	AEO	
67	CentralNic Invoice for December 2014	12/31/14	XYZ 00221875	AEO	
68	CentralNic Invoice for January 2015	1/31/15	XYZ 00222181	AEO	
69	CentralNic Invoice for February 2015	2/28/15	XYZ 00222102	AEO	

No.	Description	Date	Bates No.	Conf.	Objections
70	CentralNic Invoice for March 2015	3/31/15	XYZ 00222103	AEO	
71	CentralNic Invoice for April 2015	4/30/15	XYZ 00222104	AEO	
72	CentralNic Invoice for May 2015	5/31/15	XYZ 00222105	AEO	
73	CentralNic Invoice for June 2014	6/30/14	XYZ 00221877	AEO	
74	CentralNic Invoice for July 2014	7/31/14	XYZ 00221876	AEO	
75	Network Solutions Invoice 7/1/14		XYZ00140312	AEO	
76	Network Solutions Invoice 7/1/14 Paid	7/1/14	XYZ00187977	AEO	
77	Network Solutions Invoice 8/5/14	8/5/14	XYZ 00155397	AEO	
78	Network Solutions Invoice 8/5/14 Paid	8/5/14	XYZ00155083	AEO	

No.	Description	Date	Bates No.	Conf.	Objections
79	Network Solutions Invoice 9/18/14	9/18/14	XYZ 00172649	AEO	
80	Network Solutions Invoice 9/18/14 Paid	9/18/14	XYZ00172680	AEO	
81	ICANN Invoices for 2014 and 2015		XYZ 00221881	AEO	
82	XYZ.COM LLC Balance Sheet as of December 31, 2012	12/31/12	XYZ 00222804	AEO	
83	XYZ.COM LLC Statement of Cash Flows January through December 2012		XYZ 00222092	AEO	
84	XYZ.COM LLC Profit & Loss January through December 2012		XYZ 00222093	AEO	
85	XYZ.COM LLC Balance Sheet as of December 31, 2013		XYZ 00222094	AEO	

No.	Description	Date	Bates No.	Conf.	Objections
86	XYZ.COM LLC Statement of Cash Flows January through December 2013		XYZ 00222095	AEO	
87	XYZ.COM LLC Profit & Loss January through December 2013		XYZ 00222096	AEO	
88	XYZ.COM LLC Balance Sheet as of December 31, 2014		XYZ 00222099	AEO	
89	XYZ.COM LLC Statement of Cash Flows January through December 2014		XYZ 00222100	AEO	
90	XYZ.COM LLC Profit & Loss January through December 2014		XYZ 00222101	AEO	
91	XYZ.COM LLC Balance Sheet as of June 30, 2015		XYZ 00222106	AEO	
92	XYZ.COM LLC Statement of Cash Flows January through June 2015		XYZ 00222107	AEO	

No.	Description	Date	Bates No.	Conf.	Objections
93	XYZ.COM LLC Profit & Loss January through June 2015		XYZ 00222108	AEO	
94	XYZ.COM LLC 2012 Federal Tax Return		XYZ 00223141	AEO	
95	XYZ.COM LLC 2013 Federal Tax Return		XYZ 00223158	AEO	
96	XYZ.COM LLC 2014 Federal Tax Return		XYZ 00223119	AEO	
97	XYZ Rebate Tracker for 2014 and 2015		XYZ 00222130	AEO	
98	XYZ.COM LLC Transaction Detail for Network Solutions January through December 2014		XYZ 00222097	AEO	
99	GoDaddy Launch Plans & Proposal for .XYZ PowerPoint Presentation		XYZ 00222110	AEO	Foundation; Hearsay; Authenticity
100	Web.com Advertising Insertion Order	5/20/14	WEB000017	Conf.	

No.	Description	Date	Bates No.	Conf.	Objections
101	Web.com Marketing Agreement	5/20/14	WEB000027	AEO	
102	Web.com Advertising Revenue	12/31/14	EY-000544		Foundation; Hearsay; Authenticity; Incomplete Document
103	Email promoting .xyz domain names sent from Network Solutions	6/28/14	XYZ 00222125		Foundation; Hearsay; Authenticity; Relevance
104	XYZ placement on the Web.com 's Account Manager webpage	2/9/15	XYZ 00222119		Foundation; Authenticity; Relevance
105	XYZ placement on the Network Solutions' domain name registration webpage	6/27/14	XYZ 00222120		Foundation; Authenticity; Relevance
106	XYZ placement on the Network Solutions' Index webpage	6/27/14	XYZ 00222121		Foundation; Authenticity; Relevance
107	XYZ placement on Network Solutions' domain name search results webpage	9/5/14	XYZ 00222122		Foundation; Authenticity; Relevance
108	XYZ placement on Network Solutions' domain name search results tld webpage	6/27/14	XYZ 00222123		Foundation; Authenticity; Relevance
109	XYZ placement on Network Solutions' domain name search results tld webpage	6/27/14	XYZ 00222124		Foundation; Authenticity; Relevance

No.	Description	Date	Bates No.	Conf.	Objections
110	XYZ placement on Networks Solutions' webpage	6/27/14	XYZ 00222127		Foundation; Authenticity; Relevance
111	XYZ placement on Network Solutions' domain name registration webpage	6/27/14	XYZ 00222128		Foundation; Authenticity; Relevance
112	XYZ placement on Network Solutions' domain name search results webpage	6/27/14	XYZ 00222129		Foundation; Authenticity; Relevance
113	Verisign's CEO Jim Bidzos on Q3 2014 Results – Earnings Call Transcript	10/23/14	XYZ 00222711		Relevance; Foundation; Authenticity; Hearsay;
114	XYZ's analysis table of .com availability		XYZ 00222091		Foundation; Authenticity; Incomplete Document
115	Chart Showing Domain Volume and Timeline per Top Level Domain		XYZ 00222795		Foundation; Hearsay; Authenticity; Prejudice; Failure to timely produce
116	Chart Showing Domain Volume and Timeline per Top Level Domain		XYZ 00222796		Foundation; Hearsay; Authenticity; Prejudice; Failure to timely produce

No.	Description	Date	Bates No.	Conf.	Objections
117	Chart Showing Domain Volume and Timeline per Top Level Domain (TLD)		XYZ 00222797		Foundation; Hearsay; Authenticity; Prejudice; Failure to timely produce
118	Domain Names per TLD, By Date for .net (January 2014 – June 2015)		XYZ 00222798		Foundation; Hearsay; Authenticity; Prejudice; Failure to timely produce
119	Domain Names per TLD, By Date for .net, .xyz, and .org (January 2014 – June 2015)		XYZ 00222799		Foundation; Hearsay; Authenticity; Prejudice; Failure to timely produce
120	Domain Names per TLD, By Date for .net and .xyz (January 2014 – June 2015)		XYZ 00222800		Foundation; Hearsay; Authenticity; Prejudice; Failure to timely produce
121	Domain Names per TLD, By Date for .org (January 2014 – June 2015)		XYZ 00222801		Foundation; Hearsay; Authenticity; Prejudice; Failure to timely produce
122	Domain Names per TLD, by Date for .xyz (January 2014 – June 2015)		XYZ 00222803		Foundation; Hearsay; Authenticity; Prejudice; Failure to timely produce

No.	Description	Date	Bates No.	Conf.	Objections
123	Legend & Footnotes for Document Graph of TLDs		XYZ 00222802		Lack of Foundation; Hearsay; Authenticity; Failure to produce timely
124	Video statistics for YouTube “Move over .com - .xyz is for the next generation of the internet”	4/2/15	XYZ 00223237		Foundation; Hearsay; Authenticity; Prejudice; Failure to timely produce
125	Video statistics for YouTube “Move over .com - .xyz is for the next generation of the internet”	8/12/15	XYZ 00223223		Foundation; Hearsay; Authenticity; Prejudice; Failure to timely produce
126	“Move over .com - .xyz is for the next generation of the internet” video as referenced in the Complaint ¶¶ 17–23 and located at https://www.youtube.com/watch?v=uh_i13jluqs	6/16/14			
127	“.xyz is officially the #1 new domain extension” video as referenced in the Complaint ¶ 53(a) and located at https://www.youtube.com/watch?t=12&v=c4L8iFVKyww	6/6/14			
128	Excerpts from the transcript and videotaped deposition of Web.com Group, Inc.’s 30(b)(6) deposition taken on August 4, 2015 in Jacksonville, Florida.				Deposition transcript is an improper exhibit; Foundation; Hearsay

B. Exhibits Which May Be Used at Trial

No.	Description	Date	Bates No.	Conf.	Objections
129	ASC 605 Revenue Recognition				Foundation; Incomplete document; Failure to timely produce; prejudice
130	ASC 845 Nonmonetary Transactions				Foundation; Incomplete document; Failure to timely produce; prejudice
131	ASC 820 Fair Value Measurement				Foundation; Incomplete document; Failure to timely produce; prejudice
132	Verisign Inc.'s Form 10-K for the Period Ending 12/31/14	02/13/15	VRSN00000005 72		
133	Verisign 2014 Cooperative Marketing Fund Program Addendum		VRSN00000017 46	AEO	Incomplete Document

No.	Description	Date	Bates No.	Conf.	Objections
134	Email from Afshaan Abdul to Michael Reed regarding Registrar Analysis ii PowerPoint Presentation	4/30/15	VRSN0000003884	Conf.	Relevance; Foundation; Hearsay
135	Registrar Analysis ii PowerPoint Presentation by Afshaan Abdul	March 2015	VRSN0000003885	AEO	Relevance; Foundation; Hearsay
136	Email from Scott Schnell to George E Kilguss regarding meetings with Web.com and GoDaddy	7/12/14	VRSN0000004438	AEO	Relevance; Foundation; Hearsay
137	Email from David Kestenbaum to hello@xyz.com regarding National Public Radio Interview	4/17/14	XYZ 00073584	Conf.	Foundation; Hearsay
138	Email from Suzanne L. Chapman to Michael Reed et al. regarding Co-Op Proposal with GoDaddy	1/27/15	VRSN0000046160	AEO	Relevance; Foundation; Hearsay
139	Letter from Zedford D. Dancey to Maguy Serad (ICANN) regarding Network Solutions' XYZ Promotion	7/11/14	VRSN0000060458	AEO	

No.	Description	Date	Bates No.	Conf.	Objections
140	Letter from Matt McClure (Web.com) to Thomas C. Indelicato regarding Network Solutions' opt-out notifications	8/13/14	VRSN00000604 61	Conf.	Foundation; Hearsay
141	Email from Maguy Serad (ICANN) to Zedford Dancey regarding Network Solutions' XYZ promotion	7/17/14	VRSN00000604 63	AEO	Foundation; Hearsay
142	Email from Dan Gregson (Web.com) to Zachary Salata regarding Web.com 's advertising agreement with XYZ	7/24/14	EY-000042	Conf.	Foundation; Hearsay; Authenticity
143	New gTLDs: Competitive Tactics, Verisign Marketing Strategy and Plan PowerPoint Presentation	7/22/14	VRSN00000387 89	AEO	Foundation; Relevance; Hearsay; Incomplete Document;
144	Letter from Brian Winterfeldt to Maguy Serad (ICANN) regarding ICANN compliance relating to Web.com 's promotion of XYZ	8/6/14	WEB003096	AEO	Foundation; Hearsay; Authenticity

No.	Description	Date	Bates No.	Conf.	Objections
145	Email from Joy Morel to Michael Reed attaching The Americas & Australia GTM Plan Q1 2015 PowerPoint Presentation	3/23/15	VRSN00000021 77	AEO	Foundation; Relevance; Hearsay;
146	The Americas & Australia GTM Plan Q1 2015 PowerPoint Presentation		VRSN00000021 78	AEO	Foundation; Relevance; Hearsay;
147	Email from Scott Schnell to George Kilguss attaching Q2 Market Intel – North America	7/16/14	VRSN00000045 31	AEO	Foundation; Relevance; Hearsay;
148	Q2 Market Intel – North America		VRSN00000045 33	AEO	Foundation; Relevance; Hearsay;
149	Verisign Honors the ".com 25" and Unveils Internet Infrastructure Grants Webpage	5/26/10			Foundation; Relevance

No.	Description	Date	Bates No.	Conf.	Objections
150	Hover Article: Top 20 gTLDs - August 18 – 24, 2014	8/25/14	XYZ 00073587		Foundation; Relevance; Hearsay; Authenticity
151	Forbes Article: Domain Already Taken? Do What Google Did And Try A Not-Com Name	8/11/15			Foundation; Relevance; Hearsay; Authenticity
152	Email from Sterling P Auty (J.P. Morgan) to David Atchley attaching Domain Name Industry Takeaways from ICANN Conference Call on gTLDs	1/9/14	JPMC 00000001	Conf.	Foundation; Relevance; Hearsay; Authenticity
153	J.P. Morgan Domain Name Industry Takeaways from ICANN Conference Call on gTLDs	1/9/14	JPMC00000006	Conf.	Foundation; Relevance; Hearsay; Authenticity
154	J.P. Morgan Verisign Equity Research	1/22/15	JPMC 00000575	Conf.	Foundation; Relevance; Hearsay; Authenticity
155	“Alphabet Frenzy: .Xyz Registrations Rise in Google’s Wake” video located at http://www.bloomberg.com/news/videos/2015-08-12/alphabet-frenzy-xyz-registrations-rise-in-google-s-wake	8/12/15			Foundation; Relevance; Hearsay; Authenticity

No.	Description	Date	Bates No.	Conf.	Objections
156	.com January 2014 Activity Report	January 2014	XYZ 00222375		Foundation; Relevance; Hearsay; Authenticity
157	.com January 2014 Operator Report	January 2014	XYZ 00222463		Foundation; Relevance; Hearsay; Authenticity
158	.com January 2014 Transactions Report	January 2014	XYZ 00222386		Foundation; Relevance; Hearsay; Authenticity
159	.com February 2014 Activity Report	February 2014	XYZ 00222376		Foundation; Relevance; Hearsay; Authenticity
160	.com February 2014 Operator Report	February 2014	XYZ 00222473		Foundation; Relevance; Hearsay; Authenticity
161	.com February 2014 Transactions Report	February 2014	XYZ 00222387		Foundation; Relevance; Hearsay; Authenticity
162	.com March 2014 Activity Report	March 2014	XYZ 00222377		Foundation; Relevance; Hearsay; Authenticity
163	.com March 2014 Operator Report	March 2014	XYZ 00222483		Foundation; Relevance; Hearsay; Authenticity

No.	Description	Date	Bates No.	Conf.	Objections
164	.com March 2014 Transactions Report	March 2014	XYZ 00222388		Foundation; Relevance; Hearsay; Authenticity
165	.com April 2014 Activity Report	April 2014	XYZ 00222378		Foundation; Relevance; Hearsay; Authenticity
166	.com April 2014 Operator Report	April 2014	XYZ 00222493		Foundation; Relevance; Hearsay; Authenticity
167	.com April 2014 Transactions Report	April 2014	XYZ 00222389		Foundation; Relevance; Hearsay; Authenticity
168	.com May 2014 Activity Report	May 2014	XYZ 00222379		Foundation; Relevance; Hearsay; Authenticity
169	.com May 2014 Operator Report	May 2014	XYZ 00222503		Foundation; Relevance; Hearsay; Authenticity
170	.com May 2014 Transactions Report	May 2014	XYZ 00222390		Foundation; Relevance; Hearsay; Authenticity
171	.com June 2014 Activity Report	June 2014	XYZ 00223207		Foundation; Relevance; Hearsay; Authenticity

No.	Description	Date	Bates No.	Conf.	Objections
172	.com June 2014 Operator Report	June 2014	XYZ 00222513		Foundation; Relevance; Hearsay; Authenticity
173	.com June 2014 Transactions Report	June 2014	XYZ 00222391		Foundation; Relevance; Hearsay; Authenticity
174	.com July 2014 Activity Report	July 2014	XYZ 00223208		Foundation; Relevance; Hearsay; Authenticity
175	.com July 2014 Operator Report	July 2014	XYZ 00222523		Foundation; Relevance; Hearsay; Authenticity
176	.com July 2014 Transactions Report	July 2014	XYZ 00222392		Foundation; Relevance; Hearsay; Authenticity
177	.com August 2014 Activity Report	August 2014	XYZ 00223209		Foundation; Relevance; Hearsay; Authenticity
178	.com August 2014 Operator Report	August 2014	XYZ 00222533		Foundation; Relevance; Hearsay; Authenticity
179	.com August 2014 Transactions Report	August 2014	XYZ 00222393		Foundation; Relevance; Hearsay; Authenticity

No.	Description	Date	Bates No.	Conf.	Objections
180	.com September 2014 Activity Report	September 2014	XYZ 00223210		Foundation; Relevance; Hearsay; Authenticity
181	.com September 2014 Operator Report	September 2014	XYZ 00222543		Foundation; Relevance; Hearsay; Authenticity
182	.com September 2014 Transactions Report	September 2014	XYZ 00222394		Foundation; Relevance; Hearsay; Authenticity
183	.com October 2014 Activity Report	October 2014	XYZ 00222380		Foundation; Relevance; Hearsay; Authenticity
184	.com October 2014 Operator Report	October 2014	XYZ 00222553		Foundation; Relevance; Hearsay; Authenticity
185	.com October 2014 Transactions Report	October 2014	XYZ 00222395		Foundation; Relevance; Hearsay; Authenticity
186	.com November 2014 Activity Report	November 2014	XYZ 00222381		Foundation; Relevance; Hearsay; Authenticity
187	.com November 2014 Operator Report	November 2014	XYZ 00222563		Foundation; Relevance; Hearsay; Authenticity

No.	Description	Date	Bates No.	Conf.	Objections
188	.com November 2014 Transactions Report	November 2014	XYZ 00222396		Foundation; Relevance; Hearsay; Authenticity
189	.com December 2014 Activity Report	December 2014	XYZ 00222382		Foundation; Relevance; Hearsay; Authenticity
190	.com December 2014 Operator Report	December 2014	XYZ 00222573		Foundation; Relevance; Hearsay; Authenticity
191	.com December 2014 Transactions Report	December 2014	XYZ 00222397		Foundation; Relevance; Hearsay; Authenticity
192	.com January 2015 Activity Report	January 2015	XYZ 00222383		Foundation; Relevance; Hearsay; Authenticity
193	.com January 2015 Operator Report	January 2015	XYZ 00222583		Foundation; Relevance; Hearsay; Authenticity
194	.com January 2015 Transactions Report	January 2015	XYZ 00222398		Foundation; Relevance; Hearsay; Authenticity
195	.com February 2015 Activity Report	February 2015	XYZ 00222384		Foundation; Relevance; Hearsay; Authenticity

No.	Description	Date	Bates No.	Conf.	Objections
196	.com February 2015 Operator Report	February 2015	XYZ 00222593		Foundation; Relevance; Hearsay; Authenticity
197	.com February 2015 Transactions Report	February 2015	XYZ 00222399		Foundation; Relevance; Hearsay; Authenticity
198	.com March 2015 Activity Report	March 2015	XYZ 00222385		Foundation; Relevance; Hearsay; Authenticity
199	.com March 2015 Operator Report	March 2015	XYZ 00222603		Foundation; Relevance; Hearsay; Authenticity
200	.com March 2015 Transactions Report	March 2015	XYZ 00222400		Foundation; Relevance; Hearsay; Authenticity
201	.com April 2015 Activity Report	April 2015	XYZ 00223211		Foundation; Relevance; Hearsay; Authenticity
202	.com April 2015 Transactions Report	April 2015	XYZ 00223212		Foundation; Relevance; Hearsay; Authenticity
203	.net January 2014 Transactions Report	January 2014	XYZ 00222401		Foundation; Relevance; Hearsay; Authenticity

No.	Description	Date	Bates No.	Conf.	Objections
204	.net February 2014 Transactions Report	February 2014	XYZ 00222402		Foundation; Relevance; Hearsay; Authenticity
205	.net March 2014 Transactions Report	March 2014	XYZ 00222403		Foundation; Relevance; Hearsay; Authenticity
206	.net April 2014 Transactions Report	April 2014	XYZ 00222404		Foundation; Relevance; Hearsay; Authenticity
207	.net May 2014 Transactions Report	May 2014	XYZ 00222405		Foundation; Relevance; Hearsay; Authenticity
208	.net June 2014 Transactions Report	June 2014	XYZ 00222406		Foundation; Relevance; Hearsay; Authenticity
209	.net July 2014 Transactions Report	July 2014	XYZ 00222407		Foundation; Relevance; Hearsay; Authenticity
210	.net August 2014 Transactions Report	August 2014	XYZ 00222408		Foundation; Relevance; Hearsay; Authenticity

No.	Description	Date	Bates No.	Conf.	Objections
211	.net September 2014 Transactions Report	September 2014	XYZ 00222409		Foundation; Relevance; Hearsay; Authenticity
212	.net October 2014 Transactions Report	October 2014	XYZ 00222410		Foundation; Relevance; Hearsay; Authenticity
213	.net November 2014 Transactions Report	November 2014	XYZ 00222411		Foundation; Relevance; Hearsay; Authenticity
214	.net December 2014 Transactions Report	December 2014	XYZ 00222412		Foundation; Relevance; Hearsay; Authenticity
215	.net January 2015 Transactions Report	January 2015	XYZ 00222413		Foundation; Relevance; Hearsay; Authenticity
216	.net February 2015 Transactions Report	February 2015	XYZ 00222414		Foundation; Relevance; Hearsay; Authenticity
217	.net March 2015 Transactions Report	March 2015	XYZ 00222415		Foundation; Relevance; Hearsay; Authenticity
218	.net April 2015 Transactions Report	April 2015	XYZ 00222416		Foundation; Relevance; Hearsay; Authenticity
219	.xyz February 2014 Activity Report	February 2014	XYZ 00222435		Foundation; Relevance; Hearsay; Authenticity

No.	Description	Date	Bates No.	Conf.	Objections
220	.xyz February 2014 Transactions Report	February 2014	XYZ 00222449		Foundation; Relevance; Hearsay; Authenticity
221	.xyz March 2014 Activity Report	March 2014	XYZ 00222436		Foundation; Relevance; Hearsay; Authenticity
222	.xyz March 2014 Transactions Report	March 2014	XYZ 00222450		Foundation; Relevance; Hearsay; Authenticity
223	.xyz April 2014 Activity Report	April 2014	XYZ 00222437		Foundation; Relevance; Hearsay; Authenticity
224	.xyz April 2014 Transactions Report	April 2014	XYZ 00222451		Foundation; Relevance; Hearsay; Authenticity
225	.xyz May 2014 Activity Report	May 2014	XYZ 00222438		Lack of Foundation; Authenticity
226	.xyz May 2014 Transactions Report	May 2014	XYZ 00222452		Foundation; Relevance; Hearsay; Authenticity
227	.xyz June 2014 Activity Report	June 2014	XYZ 00222439		Foundation; Relevance; Hearsay; Authenticity
228	.xyz June 2014 Transactions Report	June 2014	XYZ 00222453		Foundation; Relevance; Hearsay; Authenticity
229	.xyz July 2014 Activity Report	July 2014	XYZ 00222440		Foundation; Relevance; Hearsay; Authenticity

No.	Description	Date	Bates No.	Conf.	Objections
230	.xyz July 2014 Transactions Report	July 2014	XYZ 00222454		Foundation; Relevance; Hearsay; Authenticity
231	.xyz August 2014 Activity Report	August 2014	XYZ 00222441		Foundation; Relevance; Hearsay; Authenticity
232	.xyz August 2014 Transactions Report	August 2014	XYZ 00222455		Foundation; Relevance; Hearsay; Authenticity
233	.xyz September 2014 Activity Report	September 2014	XYZ 00222442		Foundation; Relevance; Hearsay; Authenticity
234	.xyz September 2014 Transactions Report	September 2014	XYZ 00222456		Foundation; Relevance; Hearsay; Authenticity
235	.xyz October 2014 Activity Report	October 2014	XYZ 00222443		Foundation; Relevance; Hearsay; Authenticity
236	.xyz October 2014 Transactions Report	October 2014	XYZ 00222457		Foundation; Relevance; Hearsay; Authenticity
237	.xyz November 2014 Activity Report	November 2014	XYZ 00222444		Foundation; Relevance; Hearsay; Authenticity

No.	Description	Date	Bates No.	Conf.	Objections
238	.xyz November 2014 Transactions Report	November 2014	XYZ 00222458		Foundation; Relevance; Hearsay; Authenticity
239	.xyz December 2014 Activity Report	December 2014	XYZ 00222445		Foundation; Relevance; Hearsay; Authenticity
240	.xyz December 2014 Transactions Report	December 2014	XYZ 00222459		Foundation; Relevance; Hearsay; Authenticity
241	.xyz January 2015 Activity Report	January 2015	XYZ 00222446		Foundation; Relevance; Hearsay; Authenticity
242	.xyz January 2015 Transactions Report	January 2015	XYZ 00222460		Foundation; Relevance; Hearsay; Authenticity
243	.xyz February 2015 Activity Report	February 2015	XYZ 00222447		Foundation; Relevance; Hearsay; Authenticity
244	.xyz February 2015 Transactions Report	February 2015	XYZ 00222461		Foundation; Relevance; Hearsay; Authenticity
245	.xyz March 2015 Activity Report	March 2015	XYZ 00222448		Foundation; Relevance; Hearsay; Authenticity

No.	Description	Date	Bates No.	Conf.	Objections
246	.xyz March 2015 Transactions Report	March 2015	XYZ 00222462		Foundation; Relevance; Hearsay; Authenticity
247	.xyz April 2015 Activity Report	April 2015	XYZ 00223275		Foundation; Relevance; Hearsay; Authenticity
248	.xyz April 2015 Transactions Report	April 2015	XYZ 00223276		Foundation; Relevance; Hearsay; Authenticity
249	Registrations of .COM domains from January 2002 – March 2015. (FRE 1006 summary of voluminous records: Verisign's .COM monthly registry reports from January 2002 – March 2015, copies of which will be provided at the agreed time for exchange of exhibits.)				Foundation; Authenticity; Incomplete; Document; Hearsay
250	Registrations of .COM domains, January 2013 – March 2015. (FRE 1006 summary of voluminous records: Verisign's .COM monthly registry reports from January 2013 – March 2015, copies of which will be provided at the agreed time for exchange of				Foundation; Authenticity; Incomplete; Document; Hearsay
251	Registrations of .NET domains, January 2002 – March 2015. (FRE 1006 summary of voluminous records: Verisign's .NET monthly registry reports from January 2002 – March 2015, copies of which will be provided at the agreed time for exchange of				Foundation; Authenticity; Incomplete; Document; Hearsay

No.	Description	Date	Bates No.	Conf.	Objections
252	New registrations of .NET domains, January 2010 – May 2015. (FRE 1006 summary of voluminous records: Verisign's .NET monthly registry reports from January 2010 – March 2015, copies of which will be provided at the agreed time for exchange of exhibits.)				Foundation; Authenticity; Incomplete; Document; Hearsay
253	New registrations of .NET domains, January 2010 – May 2015. (FRE 1006 summary of voluminous records: Verisign's .NET monthly registry reports from January 2010 – March 2015, copies of which will be provided at the agreed time for exchange of exhibits.)				Foundation; Authenticity; Incomplete; Document; Hearsay
254	Verisign .COM domains in zone file, by day, January 2014–March 2015. (FRE 1006 summary of voluminous records: Verisign's daily zone file counts which have already been produced and will be provided again at the agreed time for exchange of				Foundation; Authenticity; Incomplete; Document; Hearsay
255	.COM domains under management, by month, January 2010 - March 2015. (FRE 1006 summary of voluminous records: Verisign's .COM monthly registry reports from January 2010 – March 2015, copies of which will be provided at the agreed time for exchange of exhibits.)				Foundation; Authenticity; Incomplete; Document; Hearsay
256	.COM domains under management, by month, January 2014 - March 2015. (FRE 1006 summary of voluminous records: Verisign's .NET monthly registry reports from January 2014 – March 2015, copies of which will be provided at the agreed time for exchange of exhibits.)				Foundation; Authenticity; Incomplete; Document; Hearsay

No.	Description	Date	Bates No.	Conf.	Objections
257	Verisign .NET domains in zone file, by day, January 2014–March 2015. (FRE 1006 summary of voluminous records: Verisign’s daily zone file counts which have already been produced and will be provided again at the agreed time for exchange of				Foundation; Authenticity; Incomplete; Document; Hearsay
258	.NET new registrations, by month, January 2010–May 2015. (FRE 1006 summary of voluminous records: Verisign’s .NET monthly registry reports from January 2010 – March 2015, copies of which will be provided at the agreed time for exchange of				Foundation; Authenticity; Incomplete; Document; Hearsay
259	.XYZ domains under management, by month, June 2014–March 2015. (FRE 1006 summary of voluminous records: .XYZ monthly registry reports from June 2014 – March 2015, which have already been produced and will be provided again at the agreed time for exchange of exhibits.)				Foundation; Authenticity; Incomplete; Document; Hearsay

Dated: August 31, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of August, 2015, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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